

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY	)	
AVERAGE WHOLESale PRICE	)	MDL No. 1456
LITIGATION	)	
	)	CIVIL ACTION: 01-CV-12257-PBS
THIS DOCUMENT RELATES TO:	)	
	)	Judge Patti B. Saris
ALL ACTIONS	)	
	)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiffs, by their attorneys, respectfully move this Court for leave to file under seal the following pleadings and other materials: (1) Plaintiffs' Response to Track 2 Defendants' Memorandum Regarding Harold Bean; (2) Declaration of Donald E. Haviland, Esquire, In Support of Plaintiffs' Response to Track 2 Defendants' Memorandum Regarding Harold Bean, including Exhibits A, E and F.

The foregoing includes or references patient health information.

WHEREFORE, Plaintiffs respectfully request that this Court grant them leave to file the foregoing listed materials under seal.

DATED: September 5, 2006

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